



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

999 18TH STREET- SUITE 300

DENVER, CO 80202-2466

Phone 800-227-8917

<http://www.epa.gov/region08>

Ref: EPR-N

US 36 Mobility Partnership
c/o CDR Associates
Attention: Andrea Meneghel
100 Arapahoe Avenue, Suite 12
Boulder, CO 80302

Re: EPA comments on the US 36 Corridor project DEIS
CEQ# 20070323

Dear Mr. Meneghel,

The Environmental Protection Agency (EPA) Region 8 office has reviewed the Draft Environmental Impact Statement (DEIS)/Draft Section 4(f) Evaluation for the US 36 Corridor. Our comments are provided in accordance with our authorities pursuant to the National Environmental Policy Act (NEPA), 42 U.S.C. 4231, Section 309 of the Clean Air Act, and Section 404 of the Clean Water Act.

The DEIS analyzes proposed alternatives for the US 36 corridor located between I-25 in Denver and Foothills Parkway/Table Mesa Drive in Boulder, a distance of approximately 18 miles. The two build alternatives include multi-modal transportation improvements such as general purpose lanes, high occupancy vehicle (HOV) lanes, express lanes, bus improvements, new arterial lanes, and bicycle facilities. The corridor consists of a number of communities, including the City and County of Denver, the City of Westminster, the City and County of Broomfield, the City of Louisville, the Town of Superior, the City of Boulder and portions of unincorporated Adams, Jefferson and Boulder counties.

Package 2 would add two express lanes in each direction on US 36. The express lanes would connect to and be an extension of the existing reversible I-25 express lanes that go to and from downtown Denver. They would be bi-directional, located in the median and separated from the general-purpose lanes by a concrete barrier. BRT stations would be located in the median and connected to adjacent parking via pedestrian bridges or underpasses. Package 4 would add one general purpose lane and one additional BRT/HOV lane in each direction. The BRT/HOV lanes would be located in the median of US 36 in a buffer-separated configuration similar to the

existing condition between Sheridan Boulevard and Pecos Street, with new median BRT stations as in Package 2. Both packages include alternative transportation strategies and a bikeway.

For both packages, two options are being considered for the project terminus at Foothills Parkway/Table Mesa Drive in Boulder. In Option A, the express lanes or BRT/HOV lanes would merge into the general-purpose lanes just west of Cherryvale Road. Traffic could exit to Foothills Parkway or South Boulder Road, or could continue onto 28th Street. In Option B, a bus-only lane would be provided directly to Table Mesa Station via a new bridge to and from the express lanes or BRT/HOV lanes in the median. All other westbound vehicles in the express lanes or BRT/HOV lanes would be required to exit the lanes just west of Cherryvale Road and merge into the general-purpose lanes. The DEIS states that the preferred alternative will be identified in the FEIS and could be a hybrid combining features of both packages.

EPA finds the DEIS provides a thorough description of the alternatives evaluation process, the proposed alternatives and the environmental impacts of the project. The document is well-organized, with excellent graphics and schematics, and easy to read. As the environmental impacts are very similar in the two build alternatives, the likely trade-offs are greater wetlands, and Preble's meadow jumping mouse and Ute ladies'-tresses habitat protection, at the cost of less operational efficiency and safety. For example, Option A for the project terminus at Foothills Parkway/Table Mesa Drive has fewer impacts to sensitive resources, but offers less efficiency, safety and reliability than Option B.

EPA commends the project team for its collaborative process in developing the cumulative analysis methodology. The methodology recognizes the direct relationship among future land use changes, induced growth and environmental quality. The document provides information and analysis supporting the conclusion that changes in land use from now to 2030 would determine environmental impacts much more so than changing the US 36 footprint. The cumulative analysis shows how new development to support the planned population growth would occur with or without implementation of either build package. EPA supports this cooperative approach to comprehensive transportation planning including all communities in the corridor.

Our main concerns are related to the long-term sustainability of Package 4, because it does little to encourage a mode change to BRT from single occupancy vehicles (SOV) and simply adds new general purpose lanes along the corridor. Over time, the congestion in the corridor would return. Also, aside from indicating there would be increased congestion and changes in circulation patterns, the document does not analyze the impacts of adding a new general purpose lane into the city of Boulder. Adding a general purpose lane could strain the city's transportation network and appears inconsistent with Boulder's goal of no growth in long-term vehicle traffic and reduction in SOV travel. In terms of the whole project corridor, EPA is also concerned about water quality, and whether an appropriate amount of land is set aside to address post-construction stormwater management.

Based on EPA's procedures for evaluating potential environmental impacts of proposed actions and the adequacy of the information presented, EPA is rating both alternatives as EC-1.

The “EC” portion of the rating means that EPA’s review has identified environmental impacts that should be avoided in order to fully protect the environment. Specifically, EPA is concerned that improvements in mobility along US 36 would not be long term with Package 4 because reducing congestion by adding general purpose lanes is not sustainable. The “1” portion of this rating means that the draft EIS contains sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment. A summary of EPA’s rating system is enclosed.

Our detailed comments are enclosed. Thank you for your willingness to consider our comments at this stage of your planning process. If you have any questions or would like to discuss our comments, please contact me at (303-312-6004) or the lead reviewer of this project, Jody Ostendorf at (303-312-7814).

Sincerely,

/s/ Deborah Lebow
for Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

Enclosure

